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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$9,000.00 IN
U.S. CURRENCY,

15 Defendant.

CASE NO. 1:24-MC-00091-JLT

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America, and potential claimant
18 Miguel Moreno (“Moreno” or “claimant”), appearing *in propria persona*, as follows:

19 1. On or about May 2, 2024, claimant filed a claim in the administrative forfeiture
20 proceedings with the Drug Enforcement Administration (“DEA”) with respect to the Approximately
21 \$9,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on November 8, 2021.

22 2. The DEA has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimants have filed
25 a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline was July 31, 2024.

3 4. By Stipulation and Order filed August 1, 2024, the parties stipulated to extend to August
4 30, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
8 to September 29, 2024, the time in which the United States is required to file a civil complaint for
9 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
10 currency is subject to forfeiture.

11 6. Accordingly, the parties agree that the deadline by which the United States shall be required
12 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
13 the defendant currency is subject to forfeiture shall be extended to September 29, 2024.

14 Dated: August 30, 2024

PHILLIP A. TALBERT
United States Attorney

19 Dated: August 29, 2024

/s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

22 IT IS SO ORDERED.

24 Dated: August 30, 2024


UNITED STATES DISTRICT JUDGE